

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

**Illinois Commerce Commission
On Its Own Motion
Revision of 83 Ill. Adm. Code 280**

MIDAMERICAN ENERGY COMPANY IMPLEMENTATION PLAN

On November 1, 2014, 83 Ill. Adm. Code 280 ("Rule") became effective and the Rule allows for an 18-month Implementation Period. MidAmerican Energy Company ("MidAmerican") expects to fully implement the Rule no later than May 1, 2016. The attached MidAmerican Exhibit A contains MidAmerican's Implementation Plan ("Plan").

The Plan is organized by Rule section number and title with details as to the necessary work, cost, and expected time for compliance. MidAmerican based the Implementation Plan timeline on monthly accomplishments and deadlines. Each item listed under the "Work to be Completed for Implementation" refers to information technology, process changes, and/or updates to MidAmerican's customer information system, website, bill, tariff, and/or voice response unit. MidAmerican's customer service system is referred to in the Plan as CSS. These items and the corresponding completion date include and anticipate training MidAmerican employees, who handle customer calls or work in customer service functions, on the new/revised procedures. MidAmerican has included only those sections in which it needs lead time to implement. Therefore, any section of the Rule not listed in MidAmerican Exhibit A means that MidAmerican is currently in compliance with that section. MidAmerican will update its tariff as detailed below and in instances where the Rule sections have been changed. It should be noted that due to the complexity of the required changes not all system updates could be completed at the same time, therefore, there are multiple implementation dates. In addition, the implementation costs and completion dates may vary as the implementation progresses.

Pursuant to the Rule, MidAmerican will update this Plan every 120 days until full compliance is reached.

**MIDAMERICAN EXHIBIT A
MIDAMERICAN'S IMPLEMENTATION PLAN**

Section 280.15 Compliance

MidAmerican anticipates full compliance with Section 280.15 filing of Compliance Implementation Plan by January 1, 2015. Required periodic updates will be submitted until the plan, in its entirety, is complete.

The estimated cost and work needed to reach full compliance is included in each individual section with the total cost estimated at \$320,736 for full implementation.

Section 280.20 Definitions

MidAmerican anticipates full compliance with this section of the Rule in *March 30, 2015*. The estimated cost of compliance is approximately \$22,482.

Work to be Completed for Implementation	Anticipated Completion Date
CSS will be changed for low income certified accounts to be programed to allow for longer approval periods.	<i>March 30, 2015</i>
Online procedures will be updated to reflect this change.	<i>March 30, 2015</i>

Section 280.30 Application

MidAmerican anticipates full compliance with this section of the Rule in *November 15, 2015*.

The estimated cost of compliance is approximately \$4,692.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
Update tariff with application process and list of acceptable forms of identification	<i>November 15, 2015</i>
Update the MidAmerican website to include the application process and list of acceptable forms of identification	<i>November 15, 2015</i>
Create a hard-copy of the application process and list of acceptable forms of identification, so that upon request, it can be mailed to an applicant	<i>November 15, 2015</i>
Create a new customer contact type in CSS to record when an application is approved.	<i>November 15, 2015</i>
Create a new customer contact type in CSS to record when an application is rejected and the reason for the rejection.	<i>November 15, 2015</i>
A letter will be updated in CSS to be issued when a payment plan for past due debts is refused.	<i>November 15, 2015</i>
A letter for refusal of service will be developed that lists the reason for the refusal.	<i>November 15, 2015</i>
Create a database to store all applicants' Preferred Method of Contact.	<i>November 15, 2015</i>
Update IVR to include a disclaimer stating that the applicant/customer may not receive all communications through their preferred method of contact.	<i>November 15, 2015</i>
Update website to contain a disclaimer stating that the applicant/customer may not receive all communications through their preferred method of contact.	<i>November 15, 2015</i>

Section 280.35 Revert to Landlord/Property Management Agreements

MidAmerican anticipates full compliance with this section of the Rule in *April 30, 2015*.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
Update tariff with the current landlord prearrangement form	<i>April 30, 2015</i>

Section 280.40 Deposits

MidAmerican anticipates full compliance with this section of the Rule in *April 30, 2016*.

The estimated cost of compliance is approximately \$91,389.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
Update CSS to automatically send deposit warning letter that includes the reason for the deposit, the amount of the deposit, payment schedule and due dates, the refund and interest policy, low income deposit rules and ICC contact information.	<i>April 30, 2016</i>
Add the amount of the deposit held and accumulated interest on the customer bill (see also 280.50 (c) (H))	<i>April 30, 2016</i>

Section 280.45 Deposits for Low Income Customers

MidAmerican anticipates full compliance with this section of the Rule in *April 30, 2016*.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
MidAmerican will not assess a deposit to certified Low Income customer accounts. Online procedures will be updated to reflect this.	<i>April 30, 2016</i>

Section 280.50 Billing

MidAmerican anticipates being compliance with this section of the Rule in *October 1, 2015*.

The estimated cost of compliance is approximately \$32,952.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
Itemize on bill the amount of customer deposit held or owing and accumulated interest.	<i>October 1, 2015</i>
Bill to include ICC Consumer Services Division (CSD) phone number for inquiries or complaints.	<i>October 1, 2015</i>
Add a bill message that customers with a dispute should contact MidAmerican first before seeking assistance from ICC CSD	<i>October 1, 2015</i>
Add a bill message with the name and contact information for any supplier or other parties authorized by the Commission to appear on the bill and with which the customer has contracted.	<i>October 1, 2015</i>
Add a bar graph to the bill to show current usage and the customer's previous 12 months of historical usage.	<i>October 1, 2015</i>
Update MidAmerican tariff and website with a sample bill.	<i>October 1, 2015</i>

Section 280.65 Late Payment Fee Waiver for Low Income Customers

MidAmerican anticipates full compliance with this section of the Rule in *March 30, 2015*.

The estimated cost of compliance is approximately \$3,663.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
The CSS system will be changed to not assess late payment fees while an account is qualified as a low income customer.	<i>March 30, 2015</i>

Section 280.70 Preferred Payment Date

MidAmerican anticipates full compliance with this section of the Rule in *October 1, 2015*.

The estimated cost of compliance is approximately \$24,744.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
The CSS system will be updated to add a bill message to accounts that pay late two times in a twelve month period that preferred due dates are available.	<i>October 1, 2015</i>

Section 280.80 Budget Payment Plan

MidAmerican anticipates full compliance with this section of the Rule in *October 1, 2015*.

The estimated cost of compliance is approximately \$1,683.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
Letters and postage paid response cards will be sent to all existing customers that are on an annual budget plan review. As approved by ICC, if the customer mails the response card back they can remain on the annual review. Those that do not respond will be changed to a quarterly review plan.	<i>October 1, 2015</i>
The CSS system will restrict access to set-up a budget on an annual review. Annual review requests will be handled by a separate department, they will email an authorization letter to the customer to obtain approval from the customer for an annual budget review.	<i>October 1, 2015</i>

Section 280.90 Estimated Bills

MidAmerican anticipates full compliance with this section of the Rule in *October 1, 2015*.

The estimated cost of compliance is approximately \$16,221.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
Update the existing door tag to include these requirements	<i>October 1, 2015</i>
Create a review item (WFM) to research accounts what have consecutive estimates. The customer will be contacted via a phone call and a letter when appropriate.	<i>October 1, 2015</i>
Update CSS system to add letter to be sent for estimated read access requests.	<i>October 1, 2015</i>
Create new types of contacts in CSS to record when a meter is estimated and when customer letters are generated. Will add more letters to be auto-issued when estimated reads occur.	<i>October 1, 2015</i>

Section 280.110 Refunds and Credits

MidAmerican anticipates full compliance with this section of the Rule in *October 1, 2015*.

The estimated cost of compliance is approximately \$5,820.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
Add a new non-service business type that will display as a line item on customer bills for refunds and credits for interest paid.	<i>October 1, 2015</i>
Create a bill insert to be mailed with bill where credits were applied that will describe the reason for the credit or refund to the customer	<i>October 1, 2015</i>

Section 280.120 Deferred Payment Arrangements

MidAmerican anticipates full compliance with this section of the Rule in *May 1, 2015*.

The estimated cost of compliance is approximately \$62,883.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
Information will be added to bills that are on deferred payment agreements (DPA) that states: "...a late or partial payment may result in the cancellation of the DPA, causing the total deferred amount and current charges to become immediately due in full; and non-payment of the full amount due may result in disconnection..."	<i>May 1, 2015</i>
With the disconnection notice that is issued after a DPA defaults a separate page will be added that states the amount required to reinstate the DPA and must paid in full by a certain date and that later payment may result in additional charges or the cancellation of the DPA.	<i>May 1, 2015</i>
A system generated prompt for account review (WFM) will be generated if a customer meets the reinstate requirements and did not contact MEC to advise of their intent to reinstate the DPA.	<i>May 1, 2015</i>
Add a DPA type to CSS called Illinois Renegotiated DPA.	<i>May 1, 2015</i>

Section 280.125 Deferred Payment Arrangements for Low Income Customers

MidAmerican anticipates full compliance with this section of the Rule in *March 30, 2015*.

The estimated cost of compliance is approximately \$8,424.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
A new DPA type will be established in CSS called a Low Income DPA. The required terms for the DPA will be added to the system.	<i>March 30, 2015</i>
A second new DPA type will be established in CSS called an Amended Low Income DPA. The required terms for the second DPA will be added to the system as well.	<i>March 30, 2015</i>

Section 280.130 Disconnection of Service

MidAmerican anticipates full compliance with this section of the Rule in *July 30, 2015*.

The estimated cost of compliance is approximately \$21,723.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
Changes to the information required on the Disconnection Notice (also in Appendices A, B, and D) will be implemented.	<i>July 30, 2015</i>
When service is left on in between occupants the number of days the service is left on will be changed. The system will be changed to issue the order to be completed within the required number of days.	<i>July 30, 2015</i>
The leave on winter conditions notification process will be updated to ensure timely notification.	<i>July 30, 2015</i>
The warning call process will be changed to include an additional call 24 hours prior to the scheduled disconnection if the first call does not reach a person or answering machine.	<i>July 30, 2015</i>
Changes in times allowed for disconnection will be adhered to, online references and procedures will be updated	<i>July 30, 2015</i>
Medical stays from credit action will be changed to 60 days (see also 280.160)	<i>July 30, 2015</i>

Section 280.140 Disconnection for Lack of Access to Multi-Meter Premises

MidAmerican anticipates full compliance with this section of the Rule in *October 1, 2015*.

The estimated cost of compliance is approximately \$5,820.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
Procedures will be updated to reflect notification required when disconnecting service at a multi-metered premises where the disconnection will impact others that are not eligible for disconnection.	<i>October 1, 2015</i>
Add a new non-service business type that will display as a line item on customer bills for refunds and credits for interest paid. (see also 280.110)	<i>October 1, 2015</i>
A log will be developed to track all required data for at-risk buildings.	<i>October 1, 2015</i>

Section 280.160 Medical Certification

MidAmerican anticipates full compliance with this section of the Rule in *May 1, 2015*.

The estimated cost of compliance is approximately \$17,142.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
Medical stays from credit action will be changed to 60 days (see also 280.130)	<i>May 1, 2015</i>
A system prompt (WFM) will be implemented to add a medical payment agreement to begin billing with the next bill (30 days after the certification date).	<i>May 1, 2015</i>
A DPA type of medical will be added to CSS. Terms will be different based on if the service has been disconnected.	<i>May 1, 2015</i>

Section 280.210 Payment Avoidance by Location

MidAmerican anticipates full compliance with this section of the Rule in *April 30, 2015*.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
A log will be developed to track data for collection and maintenance requirements if requested by the ICC.	<i>April 30, 2015</i>

Section 280.220 Utility Complaint Process

MidAmerican anticipates full compliance with this section of the Rule in *July 1, 2015*.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
Procedures will be updated to ensure that pending disconnections for non-payment are suspended for three business days to allow the customer to contact the ICSD.	<i>July 1, 2015</i>

Section 280.240 Public Notice of Commission Rules

MidAmerican anticipates full compliance with this section of the Rule in *July 1, 2015*.

The estimated cost of compliance is approximately \$366. This cost estimate is preliminary and is subject to change.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
Appendix C will be added to the web site and a bill insert will be included with customer bills annually.	<i>July 1, 2015</i>
A message will be added to customer bills that will advise how customers can obtain a copy of the Commission's rules, this change will be implemented with 280.50.	<i>July 1, 2015</i>

Section 280.250 Second Language Requirements

MidAmerican anticipates full compliance with this section of the Rule in *October 1, 2015*.

The estimated cost of compliance is approximately \$732.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
Notice sent out for appendices A and B will include the statement “Important – This notice affects your rights and obligations and should be translated immediately”, which will be translated in Spanish.	<i>October 1, 2015</i>

Section 280.260 Customer Information Packet

MidAmerican anticipates full compliance with this section of the Rule in *June 30, 2015*.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
Post residential customer information packet to web site	<i>July 1, 2015</i>
Post commercial customer information packet to web site	<i>July 1, 2015</i>
File a current copy with ICSD	<i>July 1, 2015</i>
Update the existing packet to include all required content.	<i>July 1, 2015</i>
Annual notification to customers that the packet is available free of charge will be developed.	<i>July 1, 2015</i>

Section 280 Appendix A Disconnection Notice, Appendix B Customer Rights

MidAmerican anticipates in full compliance with this section of the Rule in *June 30, 2015*.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
The effective date will be added to disconnect notices this change will be made with 280.130	<i>June 30, 2015</i>
Other information will be added as required, this change will be made with 280.130	<i>July 30, 2015</i>

Section 280 Appendix C Public Notice

MidAmerican anticipates full compliance with this section of the Rule in *June 30, 2015*.

MidAmerican will take the following steps to implement the provisions of this section.

Work to be Completed for Implementation	Anticipated Completion Date
This notice will be added to the web site.	<i>June 30, 2015</i>